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Hon. Valerie E. Caproni,
 United States District Judge
 United States Courthouse
 40 Foley Square
 New York, NY 10007-1312

December 22, 2014

Re: G31000 North America, Inc. et al v. Paris et al, 1:14-cv-03885-VEC

Dear Judge Caproni,

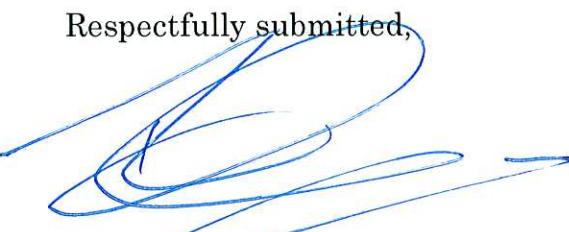
We write, briefly, in response to Defendants' letter [Docket 34] dated today. It is our submission that Defendants' Motion is frivolous and there is little need to over paper the Court. However, should the Court direct that this matter should be fully briefed, we will gladly comply.

First, the contention that Individual Practice 3.1 displaces any requirement for a motion to be noticed is erroneous.

Secondly, there is and has been no showing that this case is exceptional.

Thirdly, as demonstrated by the July 9, 2013 [Docket 10] letter and associated exhibits our firm sought to engage Defendants' counsel constructively from the outset and were rebuffed by petty gamesmanship. Not only is the historical narrative simply incorrect but any allegations of bad faith are nonsensical.

Respectfully submitted,



Robert Garson, Esq.

Cc: William Richard Wohlsifer